

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

TELEBRANDS CORPORATION,)	Case No. 1:23-cv-00631-BMB
)	
Plaintiff,)	Judge Bridget Meehan Brennan
)	
v.)	
)	
WINSTON PRODUCTS LLC,)	
)	
Defendant.)	

DEFENDANT WINSTON PRODUCTS LLC'S ATTORNEY FEE ITEMIZATION

Pursuant to Section V of the Court's Notice of Case Management Conference and Order, Defendant Winston Products LLC ("Winston") submits the following Attorney Fee Itemization.

PRELIMINARY STATEMENT

The following Attorney Fee Itemization is based on information reasonably available to Winston as of September 12, 2023. In making this Attorney Fee Itemization, Winston relies on its knowledge of the existing claims and defenses and its counsel's experience in other patent cases similar to this case in nature and scope.

As this case proceeds and reveals additional information about the case, Winston's preliminary estimate of attorney fees and costs may change. Winston reserves the right to update this estimate if requested by the Court.

Winston's Attorney Fee Itemization is made without waiving any claim of privilege or work product protection over its communications with counsel or its counsel's work product.

ATTORNEY FEES		COSTS	
Preliminary Investigation and Filing Complaint	\$50,000	Depositions	\$100,000
Procedural Motions Practice	\$50,000	Experts	\$300,000
Discovery	\$500,000	Witness Fees	\$10,000
Dispositive Motions Practice (including claims construction)	\$500,000	Other	\$100,000
Settlement Negotiations	\$50,000		
Trial	\$500,000		
TOTAL FEES	\$1,650,000	TOTAL COSTS	\$510,000

Dated: September 12, 2023

/s/ Nicholas B. Clifford

Nicholas B. Clifford (*pro hac vice*)

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